



Focus

An Environmental Management System Alternative to Pollution Prevention Planning

The EMS Alternative

Ecology now offers a new more flexible approach to pollution prevention planning for qualified facilities. A facility required to prepare a Pollution Prevention Plan or Five Year Plan Update may be able to meet these requirements by submitting documentation that they have an operating environmental management system (EMS) in place that meets a set of pre-defined pollution prevention criteria.

Why an Alternative Approach?

A number of facilities subject to the pollution prevention planning requirements of the Hazardous Waste Reduction Act (RCW 70.95C; Chapter 173-307 WAC) have already achieved the integration of pollution prevention into overall business management through adoption and implementation of an environmental management system.

Ecology recognizes that pollution prevention plans prepared in compliance with its current regulations and guidance may duplicate information contained in a facility's environmental management system. More importantly, Ecology recognizes that for many facilities, an environmental management system may represent a superior approach to the implementation of pollution prevention.

Environmental Management Systems and ISO 14001

An environmental management system identifies policies, procedures and resources for implementing and maintaining environmental management. Such systems are characterized by routine assessment of environmental impacts and opportunities and a provision for continuous improvement. The ISO 14001 criteria establishes one standard for an environmental management system, though by no means the only standard.

The Pollution Prevention Criteria outlined in the EMS Alternative should not be confused with the ISO standard as they differ in two significant respects. The Pollution Prevention Criteria are not as comprehensive as the ISO 14001 standard, and Ecology defines pollution prevention differently than does the ISO standard. The EMS Alternative is designed however to align closely with the ISO standard, so facilities in compliance with ISO 14001 should find it fairly easy to meet the requirements of this alternative.

Ecology's Pollution Prevention Criteria

Since an environmental management system doesn't necessarily emphasize prevention over pollution control techniques, Ecology has developed a set of criteria which specifically address pollution prevention in the context of an environmental management system. The criteria also include standard environmental management system requirements for policies, continual improvement, setting objectives, identifying responsibilities and monitoring and reporting.

Ecology has determined that a facility which can demonstrate achievement of these criteria has met the key provisions of pollution prevention planning. Furthermore, these facilities have set the stage for superior performance by making the identification, evaluation and implementation of pollution prevention a continuous process.

Receiving Approval for the EMS Alternative

A facility must submit written documentation that it meets the Pollution Prevention Criteria. They must agree to a site visit and review by Ecology of relevant written policies, plans, programs and other documents cited in the written documentation. Documents may remain on site at the facility. Only sections specifically pertaining to the Pollution Prevention Criteria need to be reviewed by Ecology. Once approved, the facility must conduct a periodic assessment of environmental management system implementation and provide an annual pollution prevention performance report.

Who Should Apply?

Any facility who has an operating environmental management system, and which has incorporated the principles of pollution prevention into their system is a good candidate for this alternative.

For More Information

To receive application instructions and a copy of the Pollution Prevention Criteria, contact Lynn Helbrecht at the following address and phone. Facilities interested in pursuing this alternative should contact Ecology by June 1, 1997

Department of Ecology
PO Box 47600
Olympia, WA 98504-7600
360/407-6760
360/407-6715
lhel461@ecy.wa.gov

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